



August 11, 2016

Mr. Eric Sklar
President California Fish and Game Commission
1416 Ninth Street Suite 1320
Sacramento, CA 95814

Dear President Sklar and Commissioners:

Our organizations, representing millions of sportsmen and women nationwide including tens of thousands in California, are writing to express our opposition to petition #2016-011 submitted by the Coalition for a Sustainable Delta and other water and agriculture interests. The petition proposes to decrease size limits and increase bag limits on striped bass and black bass fishing. Such action is a scientifically unjustified attempt to reduce gamefish populations and divert attention from practicable solutions to salmon recovery. This would negatively impact the robust, lucrative fishery that striped, smallmouth, and largemouth bass provide in California. It also fails to account for the recreational, conservation, and economic benefits the state and public derive from flourishing bass fisheries. We respectfully request that the Commission not further consider the petition.

No Science Supports Reducing Bass Populations to Benefit Salmon

First, this proposal is refuted by science. Peter Moyle, Ph.D. of the Davis campus of the University of California and scientists at the National Oceanic and Atmospheric Administration's Southwest Fisheries Science Center have conducted ecological research on predation in the San Joaquin River and greater Delta and concluded a predator removal program is not an effective means of restoring salmon¹².

Striped bass and black bass are well-established in the Central Valley aquatic ecosystem and have co-existed with salmon for over a century. These bass were part of California long before

¹ Peter Moyle, Ph.D., University of California Davis Center for Watershed Sciences, "Striped bass control: cure worse than disease?" January 31, 2011

² Demetras, Nicholas J., et al. "Development of underwater recorders to quantify predation of juvenile Chinook salmon (*Oncorhynchus tshawytscha*) in a river environment." *Fishery Bulletin* 114.2 (2016).

their waters were diverted for the commercial production of almonds, cotton, and pomegranates. Over time, the once abundant salmon fishery has become a shadow of its former self primarily because 65 million acres of historic wetlands and flood plains have been altered. Now the channelized river system has disadvantaged juvenile salmon to the point where something as minor as a diversion dam can leave them vulnerable to a multitude of ecological stressors³.

No scientific evidence demonstrates a strong correlation between bass diets and salmon survival. Salmon smolts are a small portion of the striped bass diet, which includes crayfish, other fish like pike minnow, and in some cases each other. Moreover, bass are not the most voracious aquatic predator in the Central Valley. If regulations called for by the petition were successful at lowering bass numbers, other predators, including channel catfish and white catfish, which are also preyed upon by striped bass, would fill the niche left by striped bass. According to the National Marine Fisheries Service, bass likely have a stabilizing influence in the Delta and provide a net positive benefit.

Most importantly, predation is natural and is particularly difficult to confront without affecting other parts of the complex ecosystem. As Dr. Moyle wrote in May 2016⁴, "Many predators forage opportunistically on whatever prey species are most abundant and accessible at any time and place. As a result, predator control can have unintended consequences." Predation, no matter the degree to which it influences other fish, or whether the predators are native or non-native, is a consequence of graver and more pressing matters afflicting the state: water conservation and management practices.

Attention is Being Misdirected Away from Productive, Cost-Effective Solutions

We understand that this petition is aimed at reducing the potential effects of predatory species and competitors on native species. More than any other stakeholder group, anglers are acutely concerned with reviving California's salmon populations, which entails making policy and regulatory changes. Due to drought, the little water that is available to salmon migrating through the Delta and down the Sacramento River is shallow and too warm. It has been shown that in wetter years when more water is kept in the Delta, more juvenile salmon survive the migration out to the ocean⁵. Efforts and resources must be concentrated on careful management of water storage and pumping operations and on improving habitat, not killing off sport fish.

Additionally, we support the state and federal environmental laws in place to protect threatened runs of salmon, and if the intent of water and agricultural interests is to safeguard dwindling salmon runs, we would expect these user groups to comply with the water pumping

³ Sean Hayes, Ph.D., National Marine Fisheries Service, Southwest Fisheries Science Center, Informational update to State Water Resources Control Board, April 19, 2016

⁴ Peter Moyle, Ph.D., University of California Davis Center for Watershed Sciences, "Understanding predation impacts on Delta native fishes" May 22, 2016

⁵ Sabal, Megan, et al. "Habitat Alterations and a Nonnative Predator, the Striped Bass, Increase Native Chinook Salmon Mortality in the Central Valley, California." *North American Journal of Fisheries Management* 36.2 (2016): 309-320.

restrictions in place. Because of their repeated lobbying for permitting more pumping, surely they are grasping for ulterior answers and striped bass and black bass are being unfairly incriminated for the demise of salmon.

Cutting into the Bass Fishery Would Cause a Significant Socio-Economic Loss to the State

Attempts to “fish down” bass species completely ignore the substantial economic and conservation benefits provided by these game fish. Just as farmers and California residents have seen the drought deteriorate the landscape and affect their livelihoods over the past few years, the fishing industry has suffered immensely too. Recreational fishermen along the coast are in dire straits because just one of the four historic runs of Chinook salmon is viable and permissible to fishing. In addition to the impact on the industry, it is obvious from the popularity of bass fishing that the public wants these resources kept intact for their recreational value.

Each year, over 1.7 million people fish recreationally in California, generating \$4.6 billion in economic activity and accounting for nearly 36,000 California jobs, in addition to generating approximately \$334 million in state and local tax revenues⁶. Bass species are no small part in this equation, as up to 51 percent of freshwater fishing is for striped and black bass⁷. Threatening the long-term viability of species anglers enjoy pursuing would result in reduced angling participation and significant losses in all of the areas mentioned above. In addition to these direct economic impacts, reductions in angler participation and opportunities pose a threat to state fisheries management, as the State of California relies on both fishing license fees and excise taxes collected from the sale of fishing tackle and motorboat fuel to help fund state fisheries management carried out by state fish and wildlife department. In 2014 alone, sales of fishing licenses and tags generated nearly \$65 million⁸ in revenue for the state’s natural resource management efforts, while excise taxes on fishing tackle and motorboat fuel accounted for an additional \$17 million⁹, all of which is funneled back into conservation.

There are Creative Alternatives to Recover and Protect Salmon

The human-altered landscape and environmental conditions have led to high predation rates in certain “hot spots.” As previously described, some sections of the river would remain concentrated with predators even if bass numbers were reduced, in which case predator-prey dynamics would still be at a peak in those areas. A more sound approach is a strategic control program that targets known focal areas by reengineering habitat features and causing predators to disperse while giving salmon opportunities to seek refuge and bypass predators.

A great deal of time has been devoted to developing projects to reverse habitat loss and mitigate predation hot spots. They vary in scope and complexity, but some creative alternatives

⁶ Southwick Associates. Sportfishing in America: An Economic Force for Conservation. Produced for the American Sportfishing Association (ASA) under a U.S. Fish and Wildlife Service (USFWS) Sport Fish Restoration grant (F12AP00137, VA M-26-R) awarded by the Association of Fish and Wildlife Agencies (AFWA), 2012.

⁷ U.S. Fish and Wildlife Service, 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation

⁸ U.S. Fish and Wildlife Service, 2015 National Fishing License Report

⁹ U.S. Fish and Wildlife Service, Sport Fish Restoration Program

have been implemented already with great success. Going forward, we encourage that salmon recovery projects be implemented in a manner consistent with scientific understanding of what will have the most positive impact on salmon while minimizing adverse effects on sport fish and the ecosystem. Upon request, it would be our pleasure to provide complete details on those projects to you.

In sum, we are troubled that the petition (#2016-011) and agenda item to be discussed at your August 24-25 meeting is a distraction from tackling longer term, albeit challenging, tasks related to fish habitat and water management. We again urge you not to consider this matter any further or to refer it to the California Department of Fish and Wildlife.

Please let us know if you would like additional information. Thank you for your consideration.



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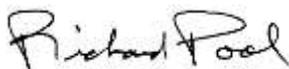
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